What is claimed is:

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- 1. A method for assisting a bank in meeting all or a portion of the bank's investment test requirement under the Community Reinvestment Act (CRA) on a taxadvantaged basis, comprising:
- providing new or existing cash value life insurance policies owned by the bank on the lives of employees of the bank, wherein the cash-value life insurance policies designate the bank as owner and beneficiary;

maintaining assets which support the cash value of the life insurance policies in a separate account that is protected from general creditors of an issuer of the life insurance policies;

wherein the assets in the separate account are used to purchase one or more bankeligible securities that are qualified investments, which promote community development, as defined under the CRA; and

wherein the assets in the separate account grow on a tax-advantaged basis, and specific qualified investments in the separate account are attributed to the bank to satisfy the investment test requirement of the bank under the CRA.

- 2. The method of claim 1, wherein the separate account includes only assets supporting the cash value of the life insurance policies provided to the bank.
- 3. The method of claim 1, wherein the separate account includes assets supporting the cash value of life insurance policies provided to a second bank.

- 4. The method of claim 3, wherein the separate account only includes assets from life insurance policies issued by a common issuer.
- 5. The method of claim 3, wherein the separate account includes assets from
  5 life insurance policies issued by different issuers.
  - 6. The method of claim 1, wherein the securities that are qualified investments under the CRA comprise mortgage-backed securities backed by loans made to low-to-moderate income borrowers.

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- 7. The method of claim 1, wherein the securities that are qualified investments under the CRA comprise collateralized mortgage obligations backed by loans made to low-to-moderate income borrowers.
- 15 8. The method of claim 1, wherein the securities that are qualified investments under the CRA comprise mortgage-backed securities backed by loans made for affordable multi-family rental housing that is eligible for the low income housing tax credit.
- 9. The method of claim 1, wherein the securities that are qualified investments under the CRA comprise collateralized mortgage obligations (CMO) backed by loans made for affordable multi-family rental housing.

- 10. The method of claim 1, wherein the securities that are qualified investments under the CRA comprise state housing authority bonds.
- 11. A system for assisting a bank in meeting all or a portion of the bank's
   5 investment test requirement under the Community Reinvestment Act (CRA) on a tax-advantaged basis, comprising:

a computer with software that electronically purchases on behalf of a separate account, one or more bank-eligible securities that are qualified investments which promote community development, as defined under the CRA;

wherein assets in the separate account support the cash value of life insurance policies owned by the bank on the lives of employees of the bank, the cash-value life insurance policies designating the bank as owner and beneficiary;

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wherein the separate account is protected from general creditors of an issuer of the life insurance policies; and

wherein the assets in the separate account grow on a tax-advantaged basis, and specific qualified investments purchased on behalf of the separate account are attributed to the bank to satisfy the investment test requirement of the bank under the CRA.